

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MARC ELLIOT,

Plaintiff,

v.

HBO HOME ENTERTAINMENT CORP., a  
Delaware Corporation; JEHANE  
NOUJAIME, an individual; KARIM AMER,  
an individual; THE OTHERS, LLC, a Florida  
limited liability company; THE OTHERS  
LICENSING CORP., a Florida corporation;  
THE SQUARE, LLC, a New York limited  
liability company; ISABELLA  
CONSTANTINO, an individual; JOHN  
DOES 1–10,

Defendants.

Case No. 4:23-cv-1611 (SEP)

**DEFENDANT ISABELLA CONSTANTINO’S MOTION FOR EXTENSION OF TIME**

Defendant Isabella Constantino, by and through undersigned counsel, moves pursuant to Fed. R. Civ. P. 6(b)(1) for a twenty-one (21) day extension of time to respond to the Complaint filed in this removed case through and including January 12, 2024. In support of this Motion and to demonstrate that good cause exists for such relief, Ms. Constantino respectfully states:

1. This case was removed to this Court on December 15, 2023, prior to Ms. Constantino’s engagement of the undersigned.
2. Due to the operation of Fed. R. Civ. P. 81(c)(2), Ms. Constantino has only until December 22, 2023, to file a responsive pleading to the Complaint.
3. Ms. Constantino has recently secured the same counsel as the other Defendants in this case, and the constraints on their time to respond are identical as those laid out in the other Defendants’ motion for an extension of time. (ECF No. 18.) Namely, although

counsel is now working diligently on a response to the Complaint, Counsel's other business—along with a planned vacation and holiday celebrations—will make filing a responsive pleading within the current deadline difficult to achieve.

4. On December 20, 2023, this Court granted the motion of the other Defendants for an extension. (ECF No. 19).
5. Ms. Constantino requests an additional twenty-one (21) days, through and including Friday, January 12, 2024, in which to respond to Plaintiff's Complaint herein.
6. This Motion is submitted in good faith and not for purposes of harassment or unreasonable delay. Plaintiff will not be prejudiced if this Motion is granted.

WHEREFORE, having shown good cause for the same, Defendant Isabella Constantino respectfully requests an extension of twenty-one (21) days to respond to the Complaint in this case and asks that the deadline for her to respond be moved to Friday, January 12, 2024 as with the other Defendants..

Respectfully submitted,

Dated: December 22, 2023

By: /s/Joseph E. Martineau

Joseph E. Martineau, #32397MO

Kolten C. Ellis, #74451MO

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 22nd day of December, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all counsel of record, as well as the following party, via the Court's electronic filing system:

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*Plaintiff, pro se*

/s/ Joseph E. Martineau \_\_\_\_\_